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November 4, 2003

RECEIVED

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PUBLIC SERVICE
COMMISSION

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: Inquiry Into the Use of Contract Service Arrangements by
Telecommunications Carriers in Kentucky
PSC 2002-00456

Dear Mr. Dorman:

BellSouth hereby files its comments regarding the Commission's Memorandum relative to the October 1, 2003 Informal Conference in the above-referenced matter.

BellSouth notes with regard to paragraph 2 of the Memorandum, that BellSouth responded to the Frankfort Electric and Water Plant Board's comments that BellSouth offers promotions in response to competition and not with reference to the Frankfort Plant Board or other potential competitors in this market. As BellSouth's representatives noted at the Informal Conference, at present, not counting the Frankfort Plant Board, there are over 30 CLECs offering telecommunications services in the Frankfort area.

In reference to paragraph 5 of the Memorandum, BellSouth notes that there are a number of sources, such as industry forums, for customers to obtain and share information related to telecommunications services. In fact, BellSouth has filed supplemental testimony to provide further details regarding some of this information.

With regard to paragraph 6 of the Memorandum, BellSouth notes that AT&T also remarked that BellSouth's filing of CSAs at the Commission allows CLECs such as AT&T to have an opportunity to resell BellSouth's CSAs. BellSouth responded at the Informal Conference that this is an inappropriate reason for requiring the filing of CSAs, since it allows CLECs to take advantage of the ILEC's compliance with this requirement and the vast majority of the CLECs either ignore the Commission's requirement to file CSAs, or take the position that this requirement somehow is not applicable to them. Thus, CLECs could utilize the ILEC's CSA filings as an easy "shopping list" for finding

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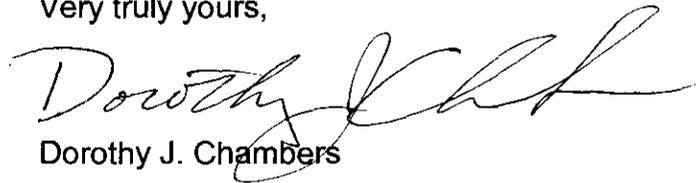
customers rather than CLECs making their own customer contacts and then reselling CSAs to customers whom they contact in the course of the CLEC's own efforts.

With regard to paragraph 8 of the Memorandum, BellSouth notes that there was open and useful discussion at the Informal Conference which included a discussion of a variety of ideas. BellSouth, however, did not make a formal proposal to file a template of contracts on the Web with a follow-up monthly report. Rather, a BellSouth representative discussed this, as well as a variety of other things, just as other participants discussed a number of ideas at the Informal Conference.

BellSouth appreciates the opportunity to file this response to the Informal Conference Memorandum.

Five paper copies and a CD-ROM of today's filing are provided to the Commission. A paper copy is provided to all parties of record.

Very truly yours,



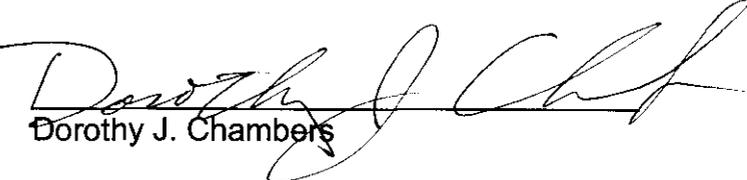
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cc: Parties of Record

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the individuals on the attached Service List by mailing a copy thereof, this 4th day of November, 2003.


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